IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	Chapter 11
FORMER BL STORES, INC., *et al.*,	Case No. 24-11967 (JKS)
Debtors.[1]	Jointly Administered

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING JOINT MOTION OF DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO APPROVE THE SETTLEMENT WITH CERTAIN OFFICERS AND DIRECTORS OF THE DEBTORS PURSUANT TO 11 U.S.C. § 105(a) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019

The undersigned counsel to the above-captioned debtors and debtors in possession (the "**Debtors**") hereby certify as follows:

1. On September 18, 2025, the Debtors filed the *Joint Motion of the Debtors and the Official Committee of Unsecured Creditors to Approve Entry into Settlement Agreement with Certain Officers and Directors of the Debtors Pursuant to 11 U.S.C. §105(a) and Federal Rule of Bankruptcy Procedure 9019* [D.I. 3166] (the "**Motion**"). Attached to the Motion was a proposed form of order (the "**Proposed Order**") approving the joint Settlement Agreement (as defined in the Motion).

2. The deadline to file responses to the relief requested in the Motion was October 2, 2025, at 4:00 p.m. (ET) (the "**Response Deadline**"). The Debtors extended the

[1] The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Response Deadline for the Office of the United States Trustee ("**U.S. Trustee**") to October 6, 2025.

3. On October 3, 2025, the U.S. Trustee filed the *United States Trustee's Objection to the Joint Motion of the Debtors and the Official Committee of Unsecured Creditors to Approve Entry into Settlement Agreement with Certain Officers and Directors of the Debtors Pursuants to 11 U.S.C. §105(a) and Federal Rule of Bankruptcy Procedure 9019* (the "**Objection**").

4. The Debtors have revised the Proposed Order to address the concerns raised by the U.S. Trustee in the Objection.

5. A copy of the revised proposed form of order is attached hereto as **Exhibit A**. The U.S. Trustee confirmed they do not object to entry of the revised order. Additionally, the Debtors provided the revised proposed form of order to counsel for the Committee, who do not object to its entry.

6. For the convenience of the Court and all parties in interest, attached hereto as **Exhibit B** is a redline of the revised proposed order against the Proposed Order that was filed with the Motion.

WHEREFORE, the Debtors respectfully request that the Court enter the revised proposed form of order at its earliest convenience.

[*Remainder of page left intentionally blank*]

Dated: October 6, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ *Sophie Rogers Churchill*
Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Daniel B. Butz (No. 4227)
Sophie Rogers Churchill (No. 6905)
Casey B. Sawyer (No. 7260)
1201 N. Market Street, 16th Floor
Wilmington, DE 19801
Tel: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
dbutz@morrisnichols.com
srchurchill@morrisnichols.com
csawyer@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)
Adam L. Shpeen (admitted *pro hac vice*)
Stephen D. Piraino (admitted *pro hac vice*)
Ethan Stern (admitted *pro hac vice*)
Kevin L. Winiarski (admitted *pro hac vice*)
450 Lexington Avenue
New York, NY 10017
Tel.: (212) 450-4000
brian.resnick@davispolk.com
adam.shpeen@davispolk.com
stephen.piraino@davispolk.com
ethan.stern@davispolk.com
kevin.winiarski@davispolk.com

Counsel to the Debtors and Debtors in Possession